

1 George Haines, Esq.
2 Nevada Bar No. 9411
3 Gerardo Avalos, Esq.
4 Nevada Bar No. 15171
5 **FREEDOM LAW FIRM, LLC**
6 8985 South Eastern Ave., Suite 100
7 Las Vegas, NV 89123
8 Phone: (702) 880-5554
9 FAX: (702) 385-5518
10 Email: info@freedomlegalteam.com
11 *Attorneys for Plaintiff Jodie Lasky*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jodie Lasky,

Plaintiff,

v.

Equifax Information Services, LLC;
Experian Information Solutions, Inc.;
The Bank of Missouri, N.A.; Wells
Fargo Bank, N.A.; Capital One Bank,
N.A.; and First Premier Bank, LLC,

Defendants.

Case No.: 2:23-cv-01201

**Unopposed Motion for Extension of
Time for the Bank of Missouri, N.A.
to Answer or Otherwise Plead**

First request

1 Plaintiff Jodie Lasky, hereby files this Unopposed Motion for Extension
2 of Time for the Bank of Missouri, N.A. to Answer or Otherwise Plead, and in
3 support states:

4 The Bank of Missouri, N.A.'s ("The Bank of Missouri") responsive
5 pleading was due on August 25, 2023.

6 Plaintiff and The Bank of Missouri are actively engaged in case
7 resolution negotiations.

8 Plaintiff does not oppose an extension of The Bank of Missouri's time to
9 answer the Complaint so that the parties may devote energies to resolving this
10 matter.

11 Plaintiff files this Motion consistent with its agreement with The Bank
12 of Missouri and further files this motion respectfully requesting the Court for
13 an extension of time for The Bank of Missouri to file its responsive pleading
14 for 14 days to **Friday, September 8, 2023**.

15 Good cause exists for this extension because it will allow The Bank of
16 Missouri and its counsel to complete their investigation of the Plaintiff's claim
17 and possible defenses and prepare responsive pleading. It is further expected
18 that counsel for Plaintiff and The Bank of Missouri will continue to discuss
19 whether this matter may be resolved without further intervention from the Court
20 in the interim.

21 This is the first request for an extension of this deadline and the request
22 is made after the deadline has expired due to excusable neglect. The parties
23 previously agreed to an informal extension when they began negotiations for
24 early resolution but the parties failed to submit a request to the Court.

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1 For the forgoing reasons, Plaintiff requests that the Court issue an order
2 extending the date to **September 8, 2023** on which The Bank of Missouri must
3 answer Plaintiff's complaint or otherwise plead.

4 Dated: August 28, 2023.

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6 **FREEDOM LAW FIRM, LLC**

7 /s/ Gerardo Avalos
8 George Haines, Esq.
9 Gerardo Avalos, Esq.
10 8985 South Eastern Ave., Suite 100
11 Las Vegas, NV 89123
12 *Attorneys for Plaintiff*

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14 IT IS SO ORDERED:

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16 UNITED STATES MAGISTRATE JUDGE

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18 DATED: August 29, 2023
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